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**IN THE UNITED STATES DISTRICT COURT**

**FOR THE DISTRICT OF UTAH**

**PETTER INVESTMENTS, INC. d/b/a  
RIVEER**, a Michigan corporation,

Plaintiff,

vs.

**HYDRO ENGINEERING, INC.**, a Utah  
corporation, and **CALIFORNIA  
CLEANING SYSTEMS**, a California  
company,

Defendants.

**PLAINTIFF RIVEER'S FINAL  
INFRINGEMENT CONTENTIONS**

(LPR 3.1)

Civil Case No. 2:14-CV-00045

Judge Dee Benson

**CONTAINS INFORMATION DESIGNATED AS  
"CONFIDENTIAL—ATTORNEYS' EYES ONLY"**

Pursuant to LPR 2.3 and 3.1, Plaintiff Petter Investments, Inc. d/b/a RIVEER (“Riveer”) provides the following Final Infringement Contentions, which are subject to supplementation under Fed. R. Civ. P. 26(e)(1)(A) as this action proceeds.

In response to LPR 2.3(a), the attached claim charts provide the required “identification of each claim of each asserted patent that is allegedly infringed by the opposing party, including for each claim the applicable statutory subsection of 35 U.S.C. § 271.”

In response to LPR 2.3(b), the attached claim charts provide, “separately for each asserted claim,” the required “identification of each Accused Instrumentality of which the party claiming infringement is aware . . . identified by name, if known, or by any product, device, or apparatus which, when used, allegedly results in the practice of the claimed method or process.”

In response to LPR 2.3(c), the attached claim charts provide the required “chart identifying specifically where each element of each asserted claim is found within each Accused Instrumentality, including for each element that such party contends is governed by 35 U.S.C. § 112(f), a description of the claimed function of that element and the identity of the structure(s), act(s), or material(s) in the Accused Instrumentality that performs the claimed function.”

In response to LPR 2.3(d), the attached claim charts identify “whether each element of each asserted claim is claimed to be present in the Accused Instrumentality

literally or under the doctrine of equivalents . . . [including] an explanation of each function, way, and result that is alleged to be equivalent and why any differences are not substantial.”

In response to LPR 2.3(e), the attached claim chart provides, “for each claim that is alleged to have been indirectly infringed,” the required “identification of any direct infringement and a description of the acts of the alleged indirect infringer that contribute to or are inducing that direct infringement . . . [including] the role of each [separate] party in the direct infringement . . . .”

In response to LPR 2.3(f), the attached claim charts provide, “for any patent that claims priority to an earlier application, the priority date to which each asserted claim allegedly is entitled.”

In response to LPR 2.3(g), concerning “the basis for any allegation of willful infringement,” Riveer states that the basis for its allegation that Hydro’s infringement has been willful includes that (1) Hydro knew about each of the asserted patents before the period of its infringement commenced, (2) Hydro proceeded with its accused infringing designs despite an objectively high likelihood that its actions constituted infringement of a valid patent, and (3) this objective risk was known to Hydro, and/or was so obvious that it should have been known to Hydro.

In response to LPR 2.3(h), the attached claim charts provide the required identification, “separately for each asserted patent, each [] apparatus, product, device,

process, method, act, or other instrumentality that incorporates or reflects that particular claim, including whether there has been marking pursuant to statute.”

Dated: September 22, 2014

Respectfully submitted,

**The Eclipse Group LLP**

/s/ Stephen M. Lobbin

Stephen M. Lobbin (admitted *pro hac vice*)

*Attorneys for Plaintiff*

Mark W. Ford (10659)

Rachel Jacques (13250)

**Maschoff Brennan**

**CERTIFICATE OF SERVICE**

I hereby certify that I served the foregoing document—**PLAINTIFF RIVEER’S  
FINAL INFRINGEMENT CONTENTIONS**—pursuant to Fed. R. Civ. P. 5(b)(2)(E)  
on the parties as follows:

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Dated: September 22, 2014

/s/ Stephen M. Lobbin

# ATTACHMENT A

**Attachment A—U.S. Patent No. 6,164,298 (asserted against both Defendants)**

Claim/Element	Subsection (35 U.S.C.)	Accused Instrumentality	Literal/ DOE	Priority Date	River Product Marking
1. A modular cleaning system comprising: at least one modular wash rack for supporting an item to be washed, including:	271(a); 271(b) via instructing customers (direct infringers) re use of accused products	Hydropad (as identified in Defendants' Initial Disclosures); <i>see</i> Element 1 labeled in attached pages; <i>see also</i> Hydropad Installation Manual (HE 000219)	Literal; DOE (in the alternative) <sup>1</sup>	9/11/97	All Riverer wash racks, which have been appropriately marked.
a frame having a first wall, a second wall, a third wall, a fourth wall, each wall having an inner and an outer surface, and	(same)	<i>See</i> Element 2 labeled in attached pages; <i>see also</i> Hydropad Containment System: rail walls; inner channel beams and channel end cap form the frame and walls; channel end cap and side gutter (HE 000222, HE 000253, HE 000271).	(same)	(same)	(same)
a bottom surface extending between the inner surfaces of said first, second, third, and fourth walls of said frame to	(same)	<i>See</i> Element 3 labeled in attached pages.	(same)	(same)	(same)

<sup>1</sup> If a particular element cannot be satisfied literally under whatever claim construction is reached, Plaintiff reserves the right to assert the doctrine of equivalents (*i.e.*, that the accused and claimed elements are equivalent because of only insubstantial differences between them, and/or because the accused element matches the function, way, and result of the claimed element).

define a basin for collecting water used to clean the item as well as any debris removed from the item,						
a grate operatively associated with said first, second, third, and fourth walls for supporting the item to be washed above said bottom surface while allowing water and any debris to flow into said basin,	(same)	See Element 4 labeled in attached pages.	(same)	(same)	(same)	(same)
a drainage fitting attached to the outer surface of one of said walls so as to allow water collected in said basin to flow out said drainage fitting, and	(same)	See Element 5 labeled in attached pages.	(same)	(same)	(same)	(same)
coupling means for coupling said modular wash rack to another modular wash rack;	(same)	See Element 6 labeled in attached pages.	(same)	(same)	(same)	(same)
a tube having a first end connected to said drainage fitting; and	(same)	See Element 7 labeled in attached pages.	(same)	(same)	(same)	(same)
a pump for causing the water to flow from the basin, through the drainage fitting and through said tube.	(same)	See Element 8 labeled in attached pages.	(same)	(same)	(same)	(same)
2. The modular cleaning system as defined in claim 1, wherein said pump is a vacuum coupled to a second end of said tube.	(same)	See Hydropad Containment System: "Gutter Pump And Float Switch" (HE 000286).	(same)	(same)	(same)	(same)
3. The modular cleaning system as defined in claim 2 and further including a filter system operably associated with said vacuum such that said vacuum draws water and debris from said basin through said tube and through said filter	(same)	See Element 9 labeled in attached pages.	(same)	(same)	(same)	(same)



system so as to remove the debris from the water.						
4. The modular cleaning system as defined in claim 1 and further including a trough adjacent said first wall, said trough having a bottom sloping downward toward said drainage fitting,	(same)	See Element 10 labeled in attached pages; <i>see also</i> Hydropad Containment System: Nongutter side has height of 9 3/4" and the gutter side has a height of 6 1/4" (HE 000289).	(same)	(same)	(same)	(same)
said frame including a sloped tray,	(same)	See Element 3 labeled in attached pages.	(same)	(same)	(same)	(same)
said third wall being opposite said first wall,	(same)	See Element 3 labeled in attached pages.	(same)	(same)	(same)	(same)
said sloped tray having its highest point at said third wall and terminating at its lowest point at said trough.	(same)	See Element 3 labeled in attached pages.	(same)	(same)	(same)	(same)

## INTRODUCTION

Thank you for purchasing the Hydro Engineering Inc. Hydropad System. This manual has been prepared to help you properly and safely assemble the equipment. It includes instructions for pad, wall, discharge pump, ramp, and rain tarp installation.

The patented Hydropad system is constructed with care using the highest quality materials. The result is a durable product that will provide many years of service. Each system is fully inspected and tested at the factory to ensure ease of installation and quality workmanship.

The Hydropad system is designed to be a portable wash pad system which can be assembled, disassembled, relocated, and reassembled quickly and easily.

Hydropads are built to handle weights ranging from 2 to 30 tons per axle. Typically they are 8' wide and are available in 8', 10', 12', 14', 16', and 20' lengths. They can easily be connected together to create wash pad arrays of many sizes.

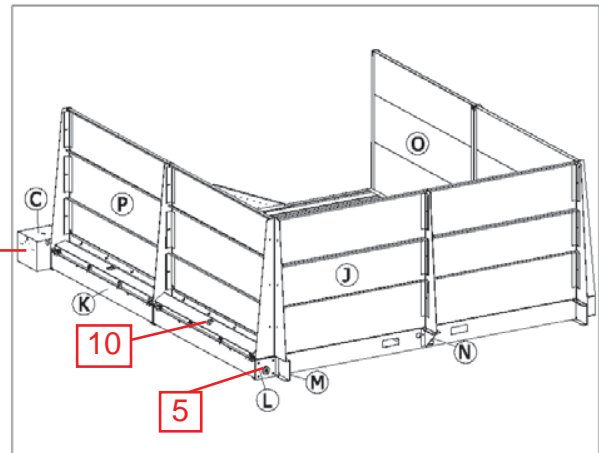
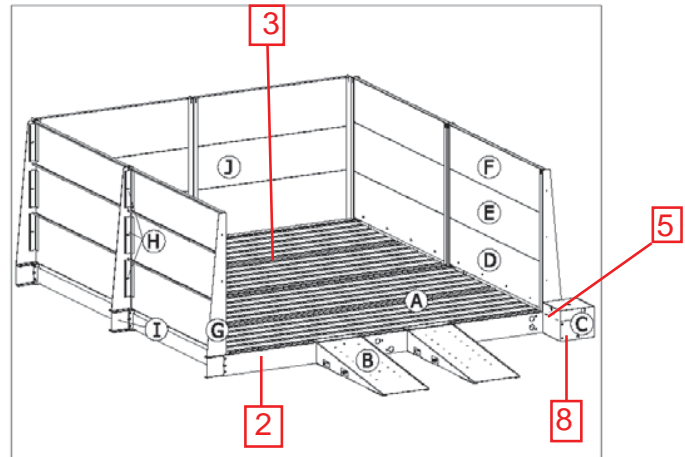
Hydropad options include walls from 4' to 8' high for outdoor use with heights available up to 12' for indoor use and several easy clean or self cleaning gutter designs. If you require any assistance, Hydro Engineering offers service contracts, installation, and training on all systems. Contact the Service Department for more details.

The Hydropad is an essential component in the equipment cleaning and wash water reclaim process. The wash wastewater is contained by the Hydropad system where it flows into the gutter. The gutter is where all the contaminants such as; mud, gravel, stones, grease, oil, and soaps removed during the cleaning process are collected.

The collected liquid is pumped out of the gutter to the Hydrokleen filtration equipment for processing. Solids that remain in the gutter can be removed by use of a sludge sucker or by shovel.

## STANDARD TERMS AND COMPONENT DEFINITIONS

The Hydropad has a number of components that will be referenced though out this document. The follow figures identify these items:



HYDROPAD LEGEND

A	Hydropad
B	Ramp
C	Gutter Sump Pump Box
D	Bottom Wall Panel
E	Middle Wall Panel
F	Top Wall Panel
G	Wall Upright
H	Wall Panel Compression
I	Wall Upright Mounting Bracket
J	Rail Wall
K	Hydropad Side Gutter
L	Gutter End Cap Seal Plate
M	Mounting Bracket Wall Upright 90 Deg.
N	Mounting Bracket Wall Upright Center
O	Non-Gutter Side Wall
P	Gutter Side Wall

2/18/2014

Self Cleaning Gutters

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[Wash Rack Systems](#)  
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## Hydropad Portable Wash Pad GUTTER CLEANING SYSTEMS



The Hydropads™ unique patented design includes a "Gutter System" that collects all wastewater containing; mud, gravel, stones, grease, oil and soaps arising from the cleaning process. These are cleaned out in many ways.

5



## Portable Wash Pads

- 3 pics, 50K Track hoe
- 2 pics, small dozer
- 6 pics, Bobcat wash bay
- 5 pics, Hydropad sites
- 4 pics, Marina applications
- 7 pics, indoor & outdoors
- 3 pics, inside wash bay

## PRODUCTS - Project Gallery



## For Those with Minimal Solids Loading

For our customers with minimal solids loading shoveling out the side gutter to remove solids that have settled out is a maintenance task that requires periodic attention. By simply opening the hinged side gutter lid you gain

<http://www.hydroblaster.com/SelfCleaningGutters.htm>



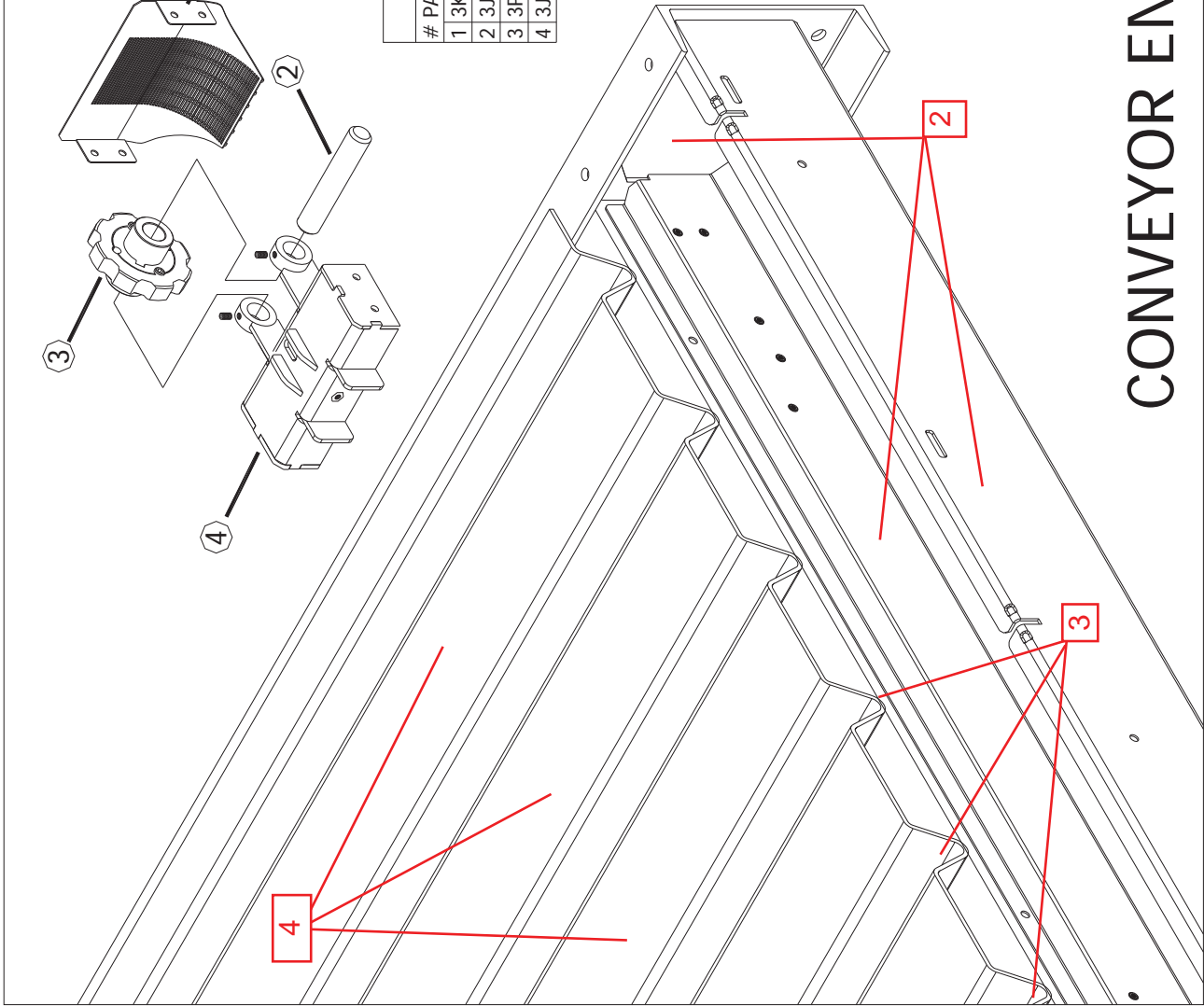
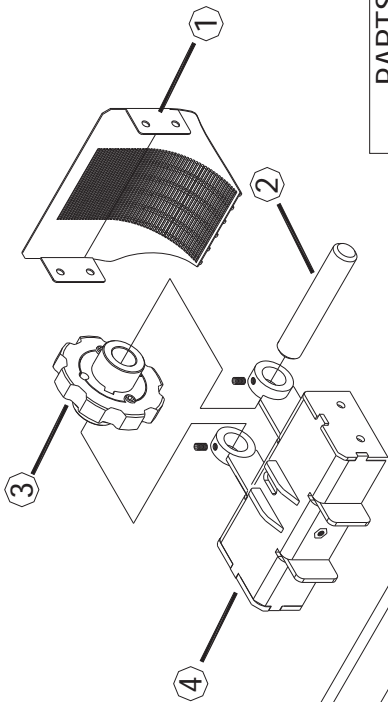
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HE-UT-PAT 000054

A11-Corrected

CONVEYOR END SECTION

PARTS LIST	
# PART #	DESCRIPTION
1	3KU086 WEDGE WIRE SCREEN, DRAG CONVEYOR
2	3JW842 SHAFT, IDLER, DRAG CONVEYOR, 1" x 5"
3	3PG245 SPROCKET ASSY, IDLER
4	3JS802 CHAIN RETURN TENSIONER BRACKET



securely located along the full length of the rail channels or at a minimum, wherever the joist channels and rail side channels join, to maintain the rated capacity of the pads. NOTE: If shims are not provided at the recommended locations, the capacity rating of the pads must be reduced. High cubic density loads that will be supported at a single point on the pad will reduce the rating more than loads that are distributed on the surface. Contact the factory for further information.

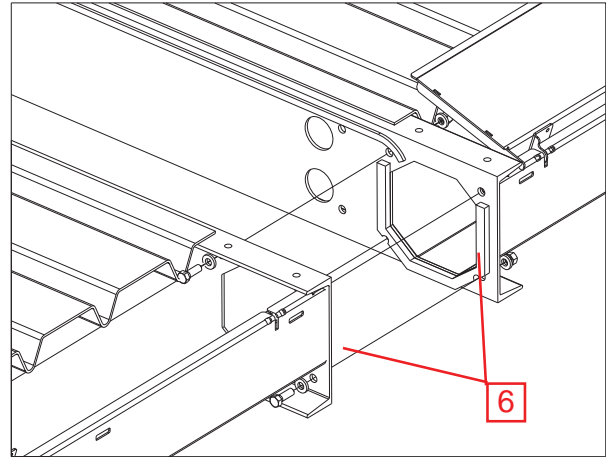
3. Dirt surfaces must be provided with excellent drainage and should be graded and compacted to provide the required slope and support for the array. Crushed gravel rather than sedimentary gravel is preferred because the sharp edges reduce movement of the material when weight is applied to the pads.

## PAD INSTALLATION

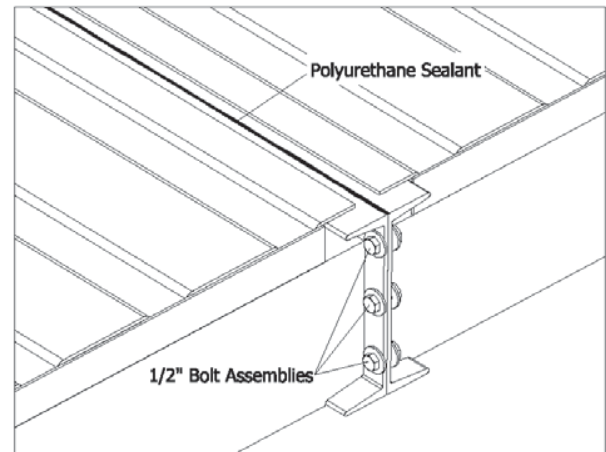
Step 1- Place the first Hydropad in the desired location and verify the slope is correct. Place the 3GN974 gasket around the inside of the 1/2" bolt holes that are located around the gutter opening. Run the D-gasket horizontally across the top of the face of the Hydropad about 1/4" below the top edge of the rail channel.

NOTE: If the pad surface is wet or cold the adhesive backing on the D-gasket will not adhere to the surface. Heating the surface with a propane torch is an effective way of preparing the surface to accept the gasket.

NOTE: If Hydropad array includes the drag conveyor option you must identify the pad that contains the return sprocket and wedge wire screen. This pad must be installed at the lowest end of the slope.



Step 2- Place and align the second pad next to the first. Make sure that the 1/2" bolt holes are aligned and that the D-gasket remains properly located between the mated surfaces. Verify that no foreign material has become trapped between the two rail channel surfaces that may keep them from properly mating and compressing the D-gasket seal.



Step 3- Secure the pads together using the 1/2"NC x 2" bolt assemblies. Four assemblies secure the gutter side and either three for four (dependent on pad tonnage rating) assemblies secure the opposite gutter side. Tighten the bolts to 70 ft. pounds.

Step 4- Run a bead of the provided (PN: 2SG262) polyurethane sealant along the top of the seam where the two pads meet. The material is self leveling but a trowel may be helpful to flatten the bead and force the sealant into the groove. This will help prevent leakage and will keep debris from entering the joint and forcing the pads apart.



gutter thumb

Page 1 of 1



# **ATTACHMENT B**

**Attachment B—U.S. Patent No. 8,499,774 (asserted against Defendant Hydro)**

Claim/Element	Subsection (35 U.S.C.)	Accused Instrumentality	Literal/ DOE	Priority Date	Riveer Product Marking
1. A wash pad comprising: a wash floor for supporting a wash item;	271(a); 271(b) via instructing customers (direct infringers) re use of accused products	Hydropad Drag Conveyor (as identified in Defendants' Initial Disclosures); <i>see</i> Element 1 labeled in attached pages.	Literal; DOE (in the alternative) <sup>1</sup>	4/14/10	All Riveer wash racks with conveyor, which have been appropriately marked.
a catch trough disposed in fluid communication with the wash floor, the catch trough collecting at least one of wash fluid and debris from the wash floor;	(same)	<i>See</i> Element 2 labeled in attached pages.	(same)	(same)	(same)
an evacuator disposed in fluid communication with an evacuation end of the catch trough, the evacuator substantially removing wash fluid received from the catch trough, the evacuator comprising: a debris collector; and a fluid mover in fluid	(same)	<i>See</i> Element 3 labeled in attached pages.	(same)	(same)	(same)

<sup>1</sup> If a particular element cannot be satisfied literally under whatever claim construction is reached, Plaintiff reserves the right to assert the doctrine of equivalents (*i.e.*, that the accused and claimed elements are equivalent because of only insubstantial differences between them, and/or because the accused element matches the function, way, and result of the claimed element).



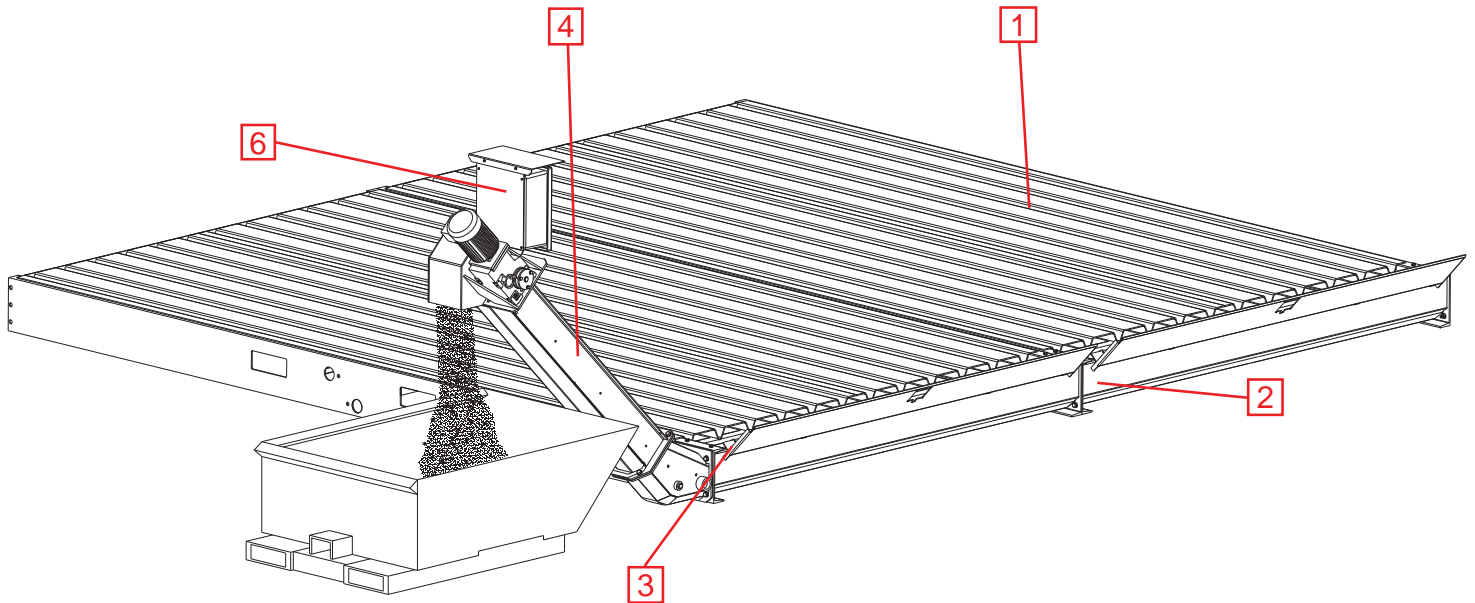
communication with the debris collector for drawing fluid through the debris collector, the debris collector configured to collect non-fluid debris;						
an elevator disposed in fluid communication with the evacuator, the elevator removing debris from the debris collector and elevating the removed debris from a collection height to a dump height for dumping; and	(same)	See Element 4 labeled in attached pages.	(same)	(same)	(same)	(same)
a conveyor disposed along the catch trough and the elevator, the conveyor moving at least one of the wash fluid and the debris collected in the catch trough to the evacuator and elevating the debris from the evacuator to the dump height.	(same)	See Element 5 labeled in attached pages.	(same)	(same)	(same)	(same)
2. The wash pad of claim 1, wherein the debris collector comprises a screen.	(same)	See Hydropad Installation Manual: "The optional flip screen gutters are designed to strain and catch larger debris before it enters the gutter. Because the screen suspends the material above the water level in the gutter, the waste is dewatered and, as a result, is substantially easier to handle" (HE-UT-PAT 000044).	(same)	(same)	(same)	(same)
3. The wash pad of claim 2, wherein the screen is disposed substantially flush with a catch trough surface.	(same)	See Hydropad Installation Manual: "The flip screen can be flipped to deposit the material onto the ground	(same)	(same)	(same)	(same)

		where it can be readily removed. Various screen inserts of differing mesh sizes and materials are available to customize the flip screen to the user needs” (HE-UT-PAT 000044).	(same)	(same)	(same)	(same)
4. The wash pad of claim 1, wherein the conveyor includes conveyor flights that scrape collected debris off of the debris collector.	(same)	See Hydropad Installation Manual: “GUTTER CONVEYOR SYSTEM - Some systems may incorporate a gutter conveyor system. The Conveyor system removes solids from the gutter and drops them into a customer supplied container to be disposed of. See additional gutter conveyor manual for installation details” (HE-UT-PAT 000049).	(same)	(same)	(same)	(same)
5. The wash pad of claim 4, wherein the conveyor flights move collected debris scraped from the debris collector to the dump height for dumping.	(same)	See Hydropad Drag Conveyor: HE-UT-PAT 000008 through HE-UT-PAT 000011; HE-UT-PAT 000019; and HE-UT-PAT 000025.	(same)	(same)	(same)	(same)
6. The wash pad of claim 1, further comprising a conveyor drive disposed at one of a dumping end of the elevator and a free end of the catch trough,	(same)	See Element 6 labeled in attached pages.	(same)	(same)	(same)	(same)
a conveyor idler disposed at the other of the dumping end and the free end, the	(same)	See Element 3 labeled in attached pages.	(same)	(same)	(same)	(same)

conveyor comprising a continuous loop arranged about the conveyor drive and the conveyor idler,					
the conveyor drive driving the conveyor to move debris collected along the catch trough along a first direction of the continuous loop over the evacuator and up the elevator to the dumping end for dumping, the conveyor returning in an opposite direction of the continuous loop to the free end of the catch trough.	(same)	See Element 3 labeled in attached pages.	(same)	(same)	(same)
7. The wash pad of claim 1, wherein the conveyor comprises a plurality of articulated sections.	(same)	See Hydropad Drag Conveyor: HE-UT-PAT 000008 through HE-UT-PAT 000011; HE-UT-PAT 000019; and HE-UT-PAT 000025.	(same)	(same)	(same)
9. The wash pad of claim 1, wherein the catch trough extends along an entire length of the wash pad.	(same)	See Element 2 labeled in attached pages.	(same)	(same)	(same)

## GUTTER CONVEYOR SYSTEM

Some system may incorporate a gutter conveyor system. The Conveyor system removes solids from the gutter and drops them into a customer supplied container to be disposed of. See additional gutter conveyor manual for installation details.



# ATTACHMENT C

**Attachment C—U.S. Patent No. 8,506,720 (asserted against Defendant Hydro)**

Claim/Element	Subsection (35 U.S.C.)	Accused Instrumentality	Literal/ DOE	Priority Date	Riveer Product Marking
1. A cleaning system comprising: a wash floor comprising a deck and being adapted to allow waste to escape the wash floor;	271(a); 271(b) via instructing customers (direct infringers) re use of accused products	Hydropad with “skid-steer side trough” or “clean-out tray” (as identified in Defendants’ Initial Disclosures); <i>See</i> Element 1 labeled in attached pages.	Literal; DOE (in the alternative) <sup>1</sup>	6/12/07	All Riveer wash racks sold with skid-steer side troughs (if any), which have been appropriately marked.
a side trough adjacent the wash floor, the side trough positioned to receive waste from the wash floor, the side trough sized to accommodate a skid-steer loader;	(same)	<i>See</i> Element 2 labeled in attached pages.	(same)	(same)	(same)
a guide rail separating the side trough	(same)	<i>See</i> Element 3 labeled in	(same) <sup>2</sup>	(same)	(same)

<sup>1</sup> If a particular element cannot be satisfied literally under whatever claim construction is reached, Plaintiff reserves the right to assert the doctrine of equivalents (*i.e.*, that the accused and claimed elements are equivalent because of only insubstantial differences between them, and/or because the accused element matches the function, way, and result of the claimed element).

<sup>2</sup> For this element, the accused infringing “clean-out tray” may be configured to include a guide rail in separate sections; first, separating the side trough from the wash floor, and second, guiding the skid-steer loader. Together, however, these sections perform the equivalent functions (1-“separating the side trough from the wash floor,” 2-“guid[ing] the skid-steer

from the wash floor and provided at least partly across a length of the cleaning system between the wash floor and the side trough to guide the skid-steer loader when the skid-steer loader is used to clean out the side trough, the guide rail defining at least one opening for allowing solids and liquids to pass from the wash floor into the side trough; and		attached pages.			
a filtering system attached to the trough, comprising a pump for pumping liquid from the trough to the filtering system.	(same)	See Hydropad Installation Manual: “The collected liquid is pumped out of the gutter to the Hydrokleen filtration equipment for processing” (HE-UT-PAT 000031).	(same)	(same)	(same)
2. The cleaning system of claim 1, wherein the wash floor is sloped at an angle other than horizontal to assist in waste escaping the wash floor.	(same)	See Element 1 labeled in attached pages; <i>see also</i> Hydropad Installation Manual: “Regardless of the base material, the surface must provide a slope for the pad or the array of pads so that the wash water flows from the pad to the gutters and from one end of the gutters to a single collection point at the other end of the	(same)	(same)	(same)

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loader,” and 3-“defining at least one opening for allowing solids and liquids to pass from the wash floor into the side trough”), in an equivalent way, to achieve an equivalent result. Any differences are insubstantial.

[illegible]



wherein the wash floor is sloped at an angle other than horizontal to assist in waste escaping the wash floor.		attached pages; <i>see also</i> Hydropad Installation Manual: “Regardless of the base material, the surface must provide a slope for the pad or the array of pads so that the wash water flows from the pad to the gutters and from one end of the gutters to a single collection point at the other end of the gutter or the gutter sump box” (HE-UT-PAT 000033).	(same)		
13. The cleaning system of claim 12, wherein the wash floor will hold at least 10,000 pounds of weight without permanently deforming.	(same)	See Hydropad Installation Manual: “Hydropads are built to handle weights ranging from 2 to 30 tons per axle” (HE-UT-PAT 000031).	(same)	(same)	(same)
16. A method of cleaning an object, comprising the steps of: (a) providing a cleaning system having a wash floor with a deck that facilitates waste removal from a wash rack; a side trough adjacent the wash floor being sized to accommodate a skid-steer loader and having a guide rail at a side thereof and separating the side trough from the wash floor, the guide rail provided to guide movement of a skid-steer loader therein positioned to receive waste from the wash floor, the guide rail defining at	(same)	See Elements 1-3 labeled in attached pages.	(same)	(same)	(same)

least one opening for allowing solids and liquids to pass from the wash floor into the side trough; and						
a filtering system attached to the trough having a pump for pumping liquid from the trough to the filtering system;	(same)	See Hydropad Installation Manual: "The collected liquid is pumped out of the gutter to the Hydrokleen filtration equipment for processing" (HE-UT-PAT 000031).	(same)	(same)	(same)	(same)
(b) placing an object on the wash floor;	(same)	See Element 1 labeled in attached pages.	(same)	(same)	(same)	(same)
(c) cleaning the object such that water and waste are eschewed into the side trough by way of the deck;	(same)	See Elements 1-2 labeled in attached pages.	(same)	(same)	(same)	(same)
(d) pumping liquid from the side trough to the filtering system; and	(same)	See Hydropad Installation Manual: "The collected liquid is pumped out of the gutter to the Hydrokleen filtration equipment for processing" (HE-UT-PAT 000031).	(same)	(same)	(same)	(same)
(e) removing the remaining matter from the side trough using a skid-steer loader.	(same)	See Hydropad Installation Manual: "Drive In Clean Out Tray - The drive in clean out tray allows solids to collect it a larger surface area where settling occurs and allows the user to empty the tray with a bobcat loader. See additional Drive in Clean out Tray	(same)	(same)	(same)	(same)

			manual for more information” (HE-UT-PAT 000050).			(same)
17. The method of claim 16, wherein the wash floor is sloped at an angle other than horizontal to assist in waste escaping the wash floor.	(same)		See Element 1 labeled in attached pages.	(same)	(same)	(same)

Internet Archive  
Wayback Machine

http://web.archive.org/web/2011015125917/http://hydroblaster.com/SkidSteerSideTrough

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http://hydroblaster.com/SkidSteerSideTrough.htm

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**Hydropad Portable Wash Pad**  
Hydro Engineering's Skid Steer Side Trough



Our newest invention allows the owner to use his skid steer front loader to muck out the side gutter of the Above Ground Wash Pad. The patented side gutter is just one of the many features which help maintain the Hydropad as the best selling above ground wash pad in the world.

**Understanding Hydropads**

Get a Quote

**Portable Wash Pads**

- 1 pcs. 50' x 10' x 2'
- 2 pcs. Small dozer
- 4 pcs. Bobcat wash bay
- 4 pcs. Hydro pad
- 4 pcs. Matina applications
- 7 pcs. Indoor & outdoors
- 3 pcs. Inside wash bay
- 4 pcs. Mining wash bay

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## DRIVE IN CLEAN OUT TRAY

The drive in clean out tray allows solids to collect in a larger surface area where settling occurs and allows the user to **empty the tray with a bobcat loader**. See additional Drive in Clean out Tray manual for more information.

